

**BAKER BOTTS LLP**

August 21, 2012

BY FACSIMILE

**MEMO ENDORSED**

The Honorable Laura Taylor Swain  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Courtroom 11C  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: AUG 24 2012  
TELEPHONE: +1 212 408 2500  
FAX: +1 212 408 2501  
www.bakerbotts.com

ABU DHABI  
AUSTIN  
BEIJING  
DALLAS  
DUBAI  
HONG KONG  
HOUSTON  
LONDON  
MOSCOW  
**NEW YORK**  
PALO ALTO  
RIYADH  
WASHINGTON

Robert L. Maier  
TEL +1 212-408-2538  
FAX +1 212-259-2538  
robert.maier@bakerbotts.com

Re: Williamson v. Verizon Communications Inc. et al., Case No. 1:11-cv-04948 (LTS)

Dear Judge Swain:

We represent Defendants AT&T, Inc., AT&T Operations, Inc., and AT&T Services, Inc. ("AT&T") in the above-referenced action, and write to request permission to file a confidential document under seal. No protective order has yet been entered in this case, though the parties are actively preparing and conferring on a form of stipulated protective order to be submitted for the Court's consideration.

AT&T is filing a declaration in support of their reply memorandum in support of their motion to strike the declaration and preclude testimony of plaintiff's proffered expert, Dr. Cooper today. One of the exhibits AT&T seeks to submit in support are portions of a deposition transcript that has been designated Highly Confidential. We respectfully request that the Court enter an Order permitting AT&T to file this supporting exhibit under seal.

AT&T has good cause for this request because the deposition transcript contains highly confidential information, the disclosure of which to the public could result in injury to AT&T. AT&T has conferred with counsel for Plaintiff in good faith and Plaintiff does not oppose this request for under seal filing.

Respectfully submitted,

Robert L. Maier

RLM:jpm

*The request is granted.*

SO ORDERED.

NEW YORK, NY   
LAURA TAYLOR SWAIN  
Aug 24, 2012 UNITED STATES DISTRICT JUDGE